



CSEPP Policy Paper Number 2

ENVIRONMENTAL SAMPLING TO DETERMINE CHEMICAL AGENT CONTAMINATION

This document establishes the Chemical Stockpile Emergency Preparedness Program (CSEPP) policy on environmental monitoring and sampling in the event lethal chemical agents are released to the environment.

In the event of a release involving the stockpile of unitary chemical weapons, the Army's Initial Response Force Commander (IRFC) or Service Response Force Commander (SFRC) also serves as the Federal On-Scene Coordinator (OSC) under the National Contingency Plan (NCP):

“(b) For releases of hazardous substances, pollutants, or contaminants, when the release is on, or the sole source of the release is from, any facility or vessel, including vessels bareboat-chartered and operated, under the jurisdiction, custody, or control of [Department of Defense] DOD... DOD shall provide OSCs/[Remedial Program Managers] RPMs responsible for taking all response actions...” (40 CFR 300.120)

The health and safety of the personnel engaged in sampling activities is a primary concern and explicitly identified in the NCP as being subject to the Hazardous Waste Operations and Emergency Response Regulations (HAZWOPER) as promulgated by the Occupational Safety and Health Administration in 29 CFR 1910.120.

“4(b)(1) All governmental agencies and private employers are directly responsible for the health and safety of their own employees.” (40 CFR 300.150)

“(a) Response actions under the NCP will comply with the provisions for response action worker safety and health in 29 CFR 1910.120.” (40 CFR 300.150)

A safe and professional sampling program requires experienced personnel, rigorous and frequent training, adequate funding, and a stringent equipment maintenance program. The Army has sampling teams located at the installations which store chemical agents. The Army, as the On-Scene Coordinator, will be responsible for sampling soil, air, and water to check for contamination by chemical agents.

State and/or local personnel may accompany Army sampling and monitoring teams under the condition that they are properly trained, qualified, and equipped in accordance with the regulations governing Hazardous Waste Operations and Emergency Response. Additionally, State and/or local personnel observing or accompanying the Army sampling teams must be fully trained and certified by the Army in chemical agent awareness and Army chemical agent sampling procedures.

These activities will use State and/or local personnel who are already trained in accordance with HAZWOPER requirements. CSEPP will not fund HAZWOPER training solely for offpost responders to accompany Army sampling teams.




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